

1 TERRENCE M. JACKSON, ESQ.  
Nevada Bar No. 00854  
2 Law Office of Terrence M. Jackson  
624 South Ninth Street  
3 Las Vegas, NV 89101  
(702) 386-0001 / Fax: (702) 386-0085  
4 Terry.Jackson.Esq@gmail.com  
Counsel for Defendant, MANUELLE ALKEINE  
5

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 \* \* \*

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 -vs-

12 MANUELLE ALKEINE,

13 Defendant.  
14

Case No.: 2:14-CR-00328-KJD-NJK

STIPULATION TO EXTEND  
OBJECTIONS  
(First Request)

15  
16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United  
17 States Attorney, and Robert Knief, Assistant United States Attorney, counsel for the United States  
18 of America, and Terrence M. Jackson, counsel for Manuelle Alkeine, that the Objections to  
19 Magistrate Recommendation (dkt. 91) be extended one month from the presently set September 12,  
20 2015, up to and including October 13, 2015.

21 The Stipulation is entered into for the following reasons:

- 22 1. The client is not in custody and does not oppose the continuance;  
23 2. The additional time requested herein is not sought for purposes of delay, but merely  
24 to allow counsel for the defendant sufficient time to receive and review the expedited transcripts of  
25 the evidentiary hearings held on May 11, 2015, and August 3, 2015;  
26 3. Denial of this request for continuance would deny counsel for the defendant sufficient  
27 time to effectively and thoroughly prepare and submit objections, taking into account the exercise  
28 of due diligence;  
4. Additionally, denial of this request for continuance could result in a miscarriage of

1 justice. The additional time requested by this stipulation is excludable in computing the time within  
2 which the trial herein must commence pursuant to the Speedy Trial Act, § 3161(h)(7)(A),  
3 considering the factors under Title 18, United States Code §§ 3161(h)(7)(B);

4 5. This is the first stipulation to extend objections.

5  
6 DATED: September 4, 2015

7 DANIEL G. BOGDEN

8 United States Attorney

9  
10 By: /s/ Terrence M. Jackson

By: /s/ Robert Knief

11 TERRENCE M. JACKSON,  
12 Counsel for Manuelle Alkeine

ROBERT KNIEF,  
Assistant United States Attorney

13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28 ...

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 \* \* \*

4 UNITED STATES OF AMERICA,

5 Plaintiff,

Case No.: 2:14-CR-00328-KJD-NJK

6 -vs-

7 MANUELLE ALKEINE,

8 Defendant.

9 FINDINGS OF FACT, CONCLUSIONS  
10 OF LAW, AND ORDER

11 FINDINGS OF FACT

12 1. The client is not in custody and does not oppose the continuance;

13 2. The additional time requested herein is not sought for purposes of delay, but merely  
14 to allow counsel for the defendant sufficient time receive and review the expedited transcripts of  
15 the evidentiary hearings held on May 11, 2015, and August 3, 2015;

16 3. Denial of this request for continuance would deny counsel for the defendant sufficient  
17 time to effectively and thoroughly prepare and submit objections, taking into account the exercise  
18 of due diligence;

19 4. Additionally, denial of this request for continuance could result in a miscarriage of  
20 justice. The additional time requested by this stipulation is excludable in computing the time  
21 within which the trial herein must commence pursuant to the Speedy Trial Act, § 3161(h)(7)(A),  
22 considering the factors under Title 18, United States Code §§ 3161(h)(7)(B);

23 5. This is the first stipulation to extend objections.

24 Based on the pending Stipulation of counsel, good cause appearing therefore, the Court  
25 finds that the ends of justice and judicial economy are best served by granting said continuance.

26 CONCLUSIONS OF LAW

27 The ends of justice served by granting said continuance outweigh the best interest of the  
28 public and the defendant in a speedy trial, since the failure to grant said continuance would be

1 likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the  
2 opportunity within which to be able to effectively and thoroughly prepare for trial, taking into  
3 account the exercise of due diligence.

4 The continuance sought herein is excludable under the Speedy Trial Act, Title 18, United  
5 States Code, §§ 3161(h)(1)(A), 3161(h)(7) and Title 18 United States Code, § 3161 (h)(7)(A),  
6 when considering the facts under Title 18, United States Code, §§ 3161(h)(7)(B) and  
7 3161(h)(7)(B)(iv).

8  
9 **ORDER**

10 IT IS THEREFORE ORDERED, that the Objections to Magistrate Recommendation  
11 (dkt.91) be extended one month from the presently set September 12, 2015, up to and including  
12 October 13, 2015.

13  
14 **DATED** this 24th day of September, 2015.

15  
16 

17 UNITED STATES DISTRICT JUDGE  
18  
19  
20  
21  
22  
23  
24  
25  
26 ...  
27  
28